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Express National Bank

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SEAN BONDOCAN,

Plaintiff,

vs.

TRANS UNION, LLC; EQUIFAX
INFORMATION SERVICES, LLC;
EXPERIAN INFORMATION
SOLUTIONS, INC.; JP MORGAN
CHASE BANK, N.A.; SYNCHRONY
FINANCIAL; AMERICAN EXPRESS
INC.; CAPITAL ONE BANK, N.A.; and
SILVER STATE SCHOOLS CREDIT
UNION,

Defendants.

Case No. 2:23-cv-01334-JCM-VCF

**AMERICAN EXPRESS NATIONAL
BANK'S MOTION TO EXTEND
TIME TO RESPOND TO
COMPLAINT**

(First Request)

1 Defendant American Express National Bank (“American Express”),
2 erroneously sued as American Express Inc., moves for a 30 day extension of time
3 to respond to the Complaint filed by Plaintiff Sean Bondocan and states as follows:

4 1. Plaintiff filed the Complaint in this Court on August 28, 2023
5 (ECF No. 1).

6 2. American Express was served with the Complaint on
7 September 18, 2023.

8 3. American Express’s deadline to respond to the Complaint is
9 currently November 8, 2023.

10 4. Good cause exists for granting this extension because
11 undersigned counsel for American Express was retained today and requires
12 additional time to investigate the allegations of the Complaint.

13 5. This is American Express’s first request for an extension of
14 time to respond to the Complaint.

15 6. This extension is sought in good faith and not for the purpose of
16 delay.

17 7. Counsel for American Express attempted to contact Plaintiff’s
18 counsel upon being retained to determine whether Plaintiff would stipulate to an
19 extension of time or would opposes this Motion. Counsel for American Express
20 left multiple voicemails and emails for Plaintiff’s counsel, but counsel for
21 American Express has not received a response to those communications.

22 8. No party will be prejudiced by this modest extension.
23
24

KAEMPFER CROWELL

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STEPTOE & JOHNSON LLP

Attorneys for Defendant American
Express National Bank

IT IS SO ORDERED.

Carla Fackler

DATED 11-9-2023

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), I certify that I am an employee of Kaempfer Crowell and that service of the **AMERICAN EXPRESS NATIONAL BANK'S MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT** was made on today's date by submitting electronically for filing and service with the United States District Court for the District of Nevada through the PACER Electronic Filing System to the addressee(s) shown below:

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Attorney for Defendant
Equifax Information Services, LLC

DATED November 8, 2023



Desiree Endres
An employee of Kaempfer Crowell